

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services)	CC Docket No. 98-67
And Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	

**REGISTRY OF INTERPRETERS REPLY TO THE NATIONAL VIDEO RELAY
SERVICE COALITION REPLY TO OPPOSITION OF SORENSON MEDIA,
INC.**

The Registry of Interpreters for the Deaf, Inc. (RID), pursuant to Section 1.429(g) of the Federal Communications Commission's ("Commission") Rules, hereby submits its reply to the "National Video Relay Service Coalition Reply of November 30, 2004," which was in reply to the "Opposition of Sorenson Media, Inc." ("Opposition") filed on November 15, 2004.

The National Video Relay Service Coalition (NVRS) argues that there is not, as Sorensen Media had stated, a shortage of interpreters to handle VRS calls and that imposing a speed of answer requirement at this time would exacerbate that shortage.

RID is in support of VRS calls being responded to in a reasonable period of time. VRS services should be fair and equitable to our citizens who are deaf. Of that, there is no question. The speed of answering calls should be reasonable and the rate of reimbursement should be such that suppliers can employ fully-qualified interpreters for this vital service.

However, RID would like to go on record as noting that there is now and has been for a number of years an overall shortage of interpreters in the United States to handle all interpreting needs, not just VRS calls.

In 1996, RID and the National Association of the Deaf (NAD) declared a national interpreter crisis in the quantity, quality and qualifications of interpreters. That crisis has not subsided. It has only exacerbated over time. In fact, NAD and RID undertook joint development of and are close to completion of a new and improved national interpreter certification test which will better be able to quantify which interpreters are qualified.

RID is painfully aware that the demand for interpreters far exceeds the supply. The critical need for more interpreters, particularly more qualified and trained interpreters, is recognized by virtually everyone in the field of deafness. The demand for qualified interpreters has increased exponentially in recent years, has outstripped the supply of qualified interpreters in many cases and shows no sign of slowing. The supply of qualified interpreters has been greatly outpaced by the demand. Interpreter training programs are but one way to meet this need. Just ten years ago, there were only approximately 25 interpreter training programs. Now, there are more than 150 in the United States and that is still not nearly enough.

Should you not be convinced of the information from RID, then it should be timely to note that the U.S. Department of Education, on November 3, advertised for comments on topics salient to this discussion. The Department of Education recognizes

the continuing, critical need for more qualified interpreters, as well as interpreter educators. Please note just some of the many applicable comments in this posting:

“Training of Interpreters for Individuals Who Are Deaf or Hard of Hearing and
Individuals Who Are Deaf-Blind [Page 64240 of the Federal Register]

Currently, the need for interpreting services exceeds the available supply of qualified interpreters. Federal legislation, such as the Rehabilitation Act of 1973, as amended, and the Education for All Handicapped Children Act of 1975 (Pub. L. 94-142) now called the Individuals with Disabilities Education Act), established the legal requirements for communication and language access. These requirements led to an increased demand for qualified interpreters, outstripped the available pool, and created a serious national shortage. The passage of the Americans with Disabilities Act of 1990, as amended, further increased the demand for interpreters and worsened the national shortage of qualified interpreters. In addition, many States have passed, or are now proposing, licensure laws for interpreters, requiring interpreters working in these States to meet specific qualifications, such as specific levels of education or certification, or both. Therefore, due to the ongoing high demand on limited resources, the pool of qualified interpreters to provide services to VR consumers continues to be insufficient.”

This does not even address the need of interpreters for VRS. The fact is that there was an ever-widening shortage of qualified interpreters nationwide for all aspects of interpreting needs prior to the onset of VRS provision. The situation for the VRS area is

no different and, in fact, just as the Department of Education indicated, the service has contributed even more to the shortage. This is not an indictment on the supply of VRS, to which we wholeheartedly agree is a very important service to the citizens of the nation who are deaf. It is merely a fact.

RID has strong concerns with a number of statements of the NVRS, such as their blanket statement that all associate RID members are qualified to interpret for VRS. Frankly, not all certified members are qualified to interpret for VRS.

Additionally, the NVRS combined the total of certified and associate members to come up with a total of "... 8,738 RID-certified interpreters ...". The very nature of the statement is incorrect. The definition of RID associate members from the RID Bylaws is as follows: *C. Associate Member (pre-certified): Any individual who is actively engaged in the interpretation of American Sign Language and English and/or the transliteration of English, but who does not hold valid certification accepted by the RID.*

We agree with the overall intent of the NVRS, and that we need to be engaged in actions that do all possible to increase the number of qualified interpreters. We ask that the actions of the FCC be so aimed as well.

We could continue on at length noting in great detail about the various aspects that are needed to ascertain whether an interpreter is qualified to interpret in VRS situation and could question statements equating state assessment systems with RID's

national certification that has been in place since 1972, but all of that would only obfuscate the main issue – that there are not nearly enough qualified interpreters in the nation for any and all interpreting situations, including the area of Video Relay Services. And that all the actions of the Federal Communications Commission should be aimed at doing what is necessary to provide adequate service to our citizens who employ Video Relay Services.